

EXHIBIT C

From: Marzullo, Michelle J. [mailto:MMarzullo@broadkline.com]
Sent: Tuesday, July 09, 2013 4:59 PM
To: Elisha N. Hawk
Subject: RE: NECC: CORRECTED vendor address

Dear Elisha,

Thank you for your call this afternoon about the objections filed on behalf of Baltimore Pain Management Center.

You asked if it would make a difference to my objections if I knew that there are BPMC patients who have not yet filed suit. Specifically you referenced two patients who are clients of yours you did not name. One who was given methylprednisolone and the other who you do not yet know what the person was given. You mentioned that both received hospital treatment shortly after their injections.

I have considered your question and reviewed the document requests. I do not see that it really changes my objections too much. Obviously, when my client becomes a defendant in any case, the question about insurance policies will become relevant and such information will be provided as appropriate. Also possibly Items 1 and 13 would be no longer objectionable as to topic, but scope still exceeds the court order. My objections concerning communications and marketing materials from NECP remain valid because the same information should be available to you from NECP, a current party. I would also continue to object to the corporate document requests, as well as document requests which appear to be attempts to have my client prove portions of Plaintiffs' case.

Please note that this email is not meant to be an exhaustive response to your question, nor is it in any way to serve as a supplement to my Objection/Motion to Quash filed earlier today. I wanted to get a response to you in advance of my vacation starting tomorrow morning and yours starting Saturday.

I will have limited availability via email over the next three days, so feel free to contact me if you have further questions.
Michelle

From: Elisha N. Hawk [mailto:EHawk@myadvocates.com]
Sent: Tuesday, July 09, 2013 1:40 PM
To: Marzullo, Michelle J.
Subject: FW: NECC: CORRECTED vendor address

Attached is the corrected notice.

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